

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: ANNIE D. LESTER**

**Case No. 19-12917**

**CREDITOR'S, 1<sup>ST</sup> FRANKLIN FINANCIAL  
CORPORATION'S, MOTION  
FOR ABANDONMENT AND RELIEF FROM  
AUTOMATIC STAY AND CO-DEBTOR STAY**

**COMES NOW**, the Creditor, 1<sup>st</sup> Franklin Financial Corporation, by and through its attorney of record, and files this its Motion for Abandonment and Relief from Automatic Stay and Co-Debtor Stay, and in support thereof, would respectfully show unto this Honorable Court, as follows:

**(1)**

On July 23, 2019, Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code.

**(2)**

Creditor would show that the creditor holds an interest in the following property which secures this debt namely, a 2016 Toro zero turn riding lawn mower and Echo weed eaters (2).

**(3)**

That the Debtor and co-maker, Milton Clayton, have not been making the payments on the subject debt.

**(4)**

That the trustee and the debtor should abandon any interest that they may have in the collateral and the stay should be lifted as to the debtor and co-debtor, Milton Clayton.

**WHEREFORE, Premises Considered**, Creditor, 1<sup>st</sup> Franklin Financial Corporation  
prays that the Bankruptcy Court will abandon and surrender the above described collateral to 1<sup>st</sup>  
Franklin Financial Corporation and grant 1<sup>st</sup> Franklin Financial Corporation relief from the  
automatic stay as to the debtor and co-debtor, Milton Clayton, to collect the debt or repossess the  
collateral held by the Creditor herein.

**RESPECTFULLY SUBMITTED, this the 27th day of August, 2019.**

**1<sup>st</sup> Franklin Financial Corporation,  
Creditor**

AKINS & ADAMS, P. A.

By: /s/ Bart M. Adams  
Bart M. Adams  
Attorney for 1<sup>st</sup> Franklin Financial  
Corporation

AKINS & ADAMS, P. A.  
108 E. JEFFERSON STREET  
RIPLEY, MISSISSIPPI 38663  
(662) 837-9976

**CERTIFICATE OF SERVICE**

I, Bart M. Adams, attorney of record for the Creditor, do hereby certify that the following parties, being registered with the CM/ECF system, have this day received electronic notification to:

Locke D. Barkley [sbeasley@barkley13.com](mailto:sbeasley@barkley13.com)

U. S Trustee [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov)

Karen B. Schneller, Esq. [karen.schneller@gmail.com](mailto:karen.schneller@gmail.com)

Milton Clayton  
1224 HWY 349 S  
Potts Camp, MS 38659-9702

SO, CERTIFIED, this, the 27<sup>th</sup> day of August, 2019.

/s/ Bart M. Adams  
Bart M. Adams  
Attorney for Creditor